IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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PABLO F. QUINONES RIVERA	*	CASE NO. 08-03794-ESL
TANIA P. RAMOS NIEVES	*	
DEBTOR(S)	*	CHAPTER 13

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MOTION AND NOTICE OF FILING OF POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN

TO THE HONORABLE COURT:

NOW COME, **PABLO F. QUINONES RIVERA and TANIA P. RAMOS NIEVES**, through the undersigned attorney, and very respectfully state and pray as follows:

1. Debtors are hereby submitting a Post-confirmation Modification of Chapter 13 Plan, dated January 19, 2010, herewith and attached to this motion.

2. This post-confirmation Plan is filed to cure arrears with Chapter 13 Trustee and provide that the debtors Surrender Collateral to Lien Holder: Pramco CV9, LLC.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN, that debtors proposed post-confirmation Plan is hereby circulated to all creditors and parties in interest. You are hereby notify that you have twenty (20) days to reject the proposed modification of this Plan and request a hearing.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors, Pablo F. Quinones Rivera and Tania P. Ramos Nieves; and to all creditors and parties in interest in the present case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 20th day of January, 2010.

/s/ Roberto Figueroa Carrasquillo
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United States Bankruptcy Court
District of Puerto Rico

IN RE: Case No. 08-3794

QUINONES RIVERA, PABLO FRANCISCO & RAMOS NIEVES, TANIA PRISCILLA Chapter 13
Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 1/19/2010 ☐ AMENDED PLAN DATED: ____
☐ PRE ☑ POST-CONFIRMATION Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 400.00	x 18	= $	7,200.00
$ 460.00	x 14	= $	6,440.00
$ 1,099.00	x 28	= $	30,772.00
$	x	= $	
$	x	= $	

TOTAL: $ 44,412.00

Additional Payments:
$ ____ to be paid as a LUMP SUM within ____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$ ____ x ____ = $ ____

PROPOSED BASE: $ 44,412.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ 2,674.00

Signed: */s/ PABLO FRANCISCO QUINONES RIVE*
Debtor

/s/ TANIA PRISCILLA RAMOS NIEVES
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR $ ____
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☑ Trustee pays secured ARREARS:

Cr. PRAMCO CV9, LLC	Cr. SCOTIABANK	Cr.
# 107120012	# 7532500000885241	#
$ 1,770.98	$ 477.16	$

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. CRIM	Cr.	Cr.
# 00130058230	#	#
$ 527.80	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☑ Debtor SURRENDERS COLLATERAL to Lien Holder:
PRAMCO CV9, LLC
5. ☐ Other:
6. ☑ Debtor otherwise maintains regular payments directly to:
SCOTIABANK

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)
D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ____
☐ Paid 100% / ☐ Other: ____

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (*Executory contracts; payment of interest to unsecureds, etc.*)
Priority- $5,730.34
***Or as otherwise specified on proof of claim.**
Late filed claims filed by creditors will receive no distribution.
"Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.
Debtor reserves the right to object claims after plan confirmation.

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